

Exhibit B

Holden Declaration

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*Counsel to the Plan Administrator for the
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
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**DECLARATION OF WILLIAM D. HOLDEN IN SUPPORT OF (NON-SUBSTANTIVE)
OMNIBUS OBJECTION OF THE PLAN ADMINISTRATOR, ON BEHALF OF THE
DEBTORS, TO CERTAIN CLAIMS**

I, William D. Holden, being duly sworn, hereby declare as follows:

1. I am the plan administrator for Gawker Media LLC ("Gawker Media"), Gawker Media Group, Inc. ("GMGI"), and Gawker Hungary, Kft. "v.a.", f/k/a Kinja, Kft. ("Gawker Hungary"), the debtors (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Cases"). I am responsible for all claims management related matters for the Debtors. I am generally familiar with the Debtors day-to-day operations, financing arrangements, business

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. "v.a." (5056). The Debtors' mailing addresses are c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, NY 10022.

affairs, and books and records that reflect, among other things, the Debtors' liabilities and the amount thereof owed to their creditors as of the Petition Date. I have read the (*Non-Substantive Omnibus Objection of the Plan Administrator, on Behalf of the Debtors, to Certain Claims*) (the "Objection") and am directly, or by and through the Debtors' advisors and personnel, familiar with the information contained therein and the exhibits attached thereto.²

2. I am authorized to submit this declaration (the "Holden Declaration") in support of the Objection. All matters set forth in this Declaration are based on: (i) my personal knowledge; (ii) my review of relevant documents; (iii) my view, based on my experience and knowledge of the Debtors' operations, books and records, and personnel; (iv) information supplied to me by others at the Debtors' request; and (v) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Debtors. If called upon to testify, I could and would testify competently to the facts set forth herein.

3. To the best of my knowledge, information, and belief, insofar as I have been able to ascertain after reasonable inquiry, considerable time and resources have been expended to ensure a high level of diligence in reviewing and reconciling the proofs of claim filed against the Debtors in the Cases. Upon a thorough review of the proofs of claim filed in the Cases and supporting documentation thereto and the prepetition liabilities listed by the Debtors on their schedules, the Debtors have determined that the liabilities listed on (i) **Schedule 1** to the Proposed Order (the "Late Filed Claim") and (ii) **Schedule 2** to the Proposed Order (the "No Liability Claim") should be disallowed and expunged in their entirety because such claim were not timely filed and the Debtors have no liability on account of the claim, respectively. Accordingly, to

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the Objection.

prevent an unwarranted recovery by the claimants asserting the Late File Claim and the No Liability Claim, I believe that the Court should disallow and expunge in their entirety the Late Filed Claim and the No Liability Claim from Debtors' Claims Register.

[Remainder of this page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 7/25, 2019

Wm. Holden

William D. Holden